



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

OCT 12 2018

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: No Further Action (NFA) Justification for Arsenic in Surficial Soil at Area of Concern 49, dated January 25, 2018  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the No Further Action (NFA) Justification for Arsenic in Surficial Soil at Area of Concern (AOC) 49, dated January 25, 2018. The January 2018 NFA AOC 49 was submitted by Chevron (Chevron) Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (TRSR). EPA and NJDEP find the proposal for NFA for arsenic in surficial soil at AOC 49 acceptable provided the below request for additional information is adequately addressed.

During the Corrective Measures Implementation (CMI) Phase I Arsenic Cap Investigation in 2012, surficial arsenic contamination exceeding the CMI Action Level of 20 mg/kg was detected in the duplicate soil sample for S2918. In 2013 and 2017, the Phase II Arsenic Cap Investigation failed to identify any surficial arsenic contamination in this area. A subsequent evaluation of the S2918 analytical results revealed a discrepancy in the laboratory data package that once corrected negated the arsenic exceedance in surficial soils at S2918.

EPA and NJDEP request a brief letter from the laboratory explaining the circumstances and resolution of the above-referenced discrepancy, as the revised data package included with the NFA Justification Letter does not go into the circumstances behind the revision.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in cursive script that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Hazardous Waste Programs Branch

cc: Lynn Vogel, NJDEP (electronic copy only)

11/18/17



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

**NOV 2 - 2018**

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: No Further Action Justification for Arsenic in Surface Soil at Area of Concern 33, dated June 18, 2018  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the No Further Action Justification for Arsenic (As) in Surface Soil at Area of Concern 33, dated June 18, 2018. The June 2018 No Further Action Justification for As in Surface Soil at AOC 33 was submitted by Chevron (Chevron) Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (TSRA). EPA and NJDEP hereby approve the June 2018 No Further Action Justification for As in Surface Soil at AOC 33, effective the date of this letter.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas". The signature is written in a cursive style.

Ricardito Vargas  
Project Manager  
Hazardous Waste Programs Branch

cc: Lynn Vogel, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

FEB 19 2019

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: In-Situ and Ex-Situ Stabilization Construction Completion Report for SWMU 7, dated April 3, 2018  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the In-situ and Ex-Situ Stabilization (ISS/ESS) Construction Completion Report (CCR) for SWMU 7, dated April 3, 2018 and submitted for the Former Chevron Perth Amboy Facility in Perth Amboy, Middlesex County, NJ. The April 2018 ISS/ESS CCR for SWMU 7 was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (TRSR). EPA and NJDEP hereby approve the April 2018 ISS/ESS CCR for SWMU 7, effective the date of this letter with clarification.

Chevron requested as part of this ISS/ESS CCR, that no further action be required for lead and tetraethyl lead (TEL) impacted soils at SWMU 7. EPA and NJDEP concur that no further remediation is necessary for lead and TEL-impacted soils at SWMU 7. EPA and NJDEP also acknowledge, as stated in the ISS/ESS CCR that, "soil with benzo(a)pyrene (BaP) impacts at concentrations greater than 0.66 mg/kg and less than 10 mg/kg will be addressed with a Facility-wide deed notice." As also noted in the ISS/ESS CCR, "lead and TEL-impacted soil in accessible areas within SWMU 7 will also be addressed with a Facility-wide deed notice", including but not limited to impacted soils along Creek Street, adjacent to ESS 3 and within the 5-foot utility buffer. It should be noted that further evaluation of groundwater was not mentioned in the text as one of the corrective measures stated in the HSWA 2013 Permit. However, EPA acknowledges Chevron's proposal of continued monitoring in section 5.0 of the text for lead in groundwater as part of the ongoing site-wide monitoring program.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas". The signature is written in a cursive style with a long, sweeping tail on the letter "s".

Ricardito Vargas  
Project Manager  
Hazardous Waste Programs Branch

cc: Lynn Vogel, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

FEB 19 2019

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: Justification for No Further Investigation for BaP in Soil Area of Concern 16C, dated June 13, 2018  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Justification for No Further Investigation (NFI) for benzo(a)pyrene (BaP) in Soil, Area of Concern (AOC) 16C, dated June 13, 2018 for the Former Chevron Perth Amboy Facility in Perth Amboy, Middlesex County, NJ. The June 2018 NFI for BaP for AOC 16C was submitted by Chevron (Chevron) Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (TRSR). EPA and NJDEP accept Chevron's proposal to address BaP contaminated soil >10 mg/kg in a sitewide AOC for Historic Fill and a deed notice for concentrations greater than 0.66 mg/kg but less than 10 mg/kg. It should be noted some information presented in Attachment 2, particularly related to SWMU 34, does not accurately reflect Chevron's proposed CM for the area. EPA and NJDEP accept the June 2018 NFI for BaP for AOC 16C, effective the date of this letter. Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Hazardous Waste Programs Branch

cc: Lynn Vogel, NJDEP (electronic copy only)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

FEB 19 2019

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: 1. Implementation Workplan, In Situ Chemical Oxidation followed by Biostimulation, Solid Waste Management Unit 8, dated February. 22, 2018 and  
2. Discharge to Groundwater Permit by Rule Authorization Request, dated Feb. 22, 2018  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Implementation Workplan, In Situ Chemical Oxidation (ISCO) followed by Biostimulation, Solid Waste Management Unit (SWMU) 8, and associated New Jersey Pollutant Discharge Elimination System (NJPDES) Discharge to Groundwater Permit by Rule Authorization Request (DGW PBR), both dated February 22, 2018 and submitted for the Former Chevron Perth Amboy Facility in Perth Amboy, Middlesex County, NJ. The February 2018 SWMU 8 ISCO IWP and associated NJPDES DGW PBR was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the Technical Requirements for Site Remediation at N.J.A.C. 7:26E (TRSR). At the request of NJDEP, additional information supporting the February 2018 SWMU 8 ISCO IWP associated NJPDES DGW PBR review was submitted by Chevron in email correspondence dated May 25, 2018 and November 19, 2018. EPA and NJDEP hereby approve the February 2018 SWMU 8 ISCO IWP and all supporting correspondence, effective the date of this letter. Please note the requirements associated with the February 2018 NJPDES DGW PBR SWMU 8 ISCO will be forwarded in a subsequent correspondence.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Hazardous Waste Programs Branch

cc: Lynn Vogel, NJDEP (electronic copy only)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

JUL 26 2019

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: No Further Action Justification for Arsenic in Surface Soil: Central Yard, dated April 23, 2019  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the No Further Action Justification (NFA) for Arsenic (As) in Surface Soil: Central Yard dated April 23, 2019, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, NJ. The April 2019 NFA for As in Surface Soil: Central Yard was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C. 7:26E. We hereby approve the NFA for As in Surface Soil: Central Yard, effective the date of this letter. Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

**JUL 30 2019**

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: No Further Action Report for Arsenic in Surface Soil, Main Yard, dated February 26, 2019  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the No Further Action Report (NFA) for Arsenic (As) in Surface Soil, Main Yard dated February 26, 2019, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, NJ. The February 2019 NFA for As in Surface Soil, Main Yard was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C. 7:26E. We hereby approve the February 2019 NFA for As in Surface Soil, Main Yard, effective the date of this letter, with additional clarification.

Section 6.0 Conclusions and Recommendations states, "As described in Section 1.1 of this report, the 2013 HSWA Permit Renewal identified 15 AOCs and SWMUs, as well as AOC 33, within the Main Yard of the Facility as requiring containment consisting of a cap to address arsenic-impacted surface soil. Arsenic-impacts associated with these 16 AOCs and SWMUs have either been previously approved for NFA, addressed by an overlapping CM, or recommended for NFA based on additional PDI data collected after the 2013 HSWA Permit Renewal. Subsurface soil deeper than 2 ft bgs with arsenic impacts at concentrations greater than 20 mg/kg will be addressed in a Facility-wide deed notice." An updated status and recommendation for these 16 AOCs/SWMUs was also included in Table 17 of this document. Please note, we concur with the previous NFA determinations for AOC 16a, 33, 34, 47, 49, 6a, and SWMU 16, 24 and 35 and concurs that NFA is necessary for AOC 23 and 44, and SWMU 19, 20, 27/39, and 41 in regard to arsenic impacted surface soil in the Main Yard.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

JUL 3 0 50 AM



Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

JUL 13 2019

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: No Further Action Report for Arsenic in Surface Soil, Main Yard, dated February 26, 2019  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the No Further Action Report (NFA) for Arsenic (As) in Surface Soil, Main Yard dated February 26, 2019, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, NJ. The February 2019 NFA for As in Surface Soil, Main Yard was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C. 7:26E. We hereby approve the February 2019 NFA for As in Surface Soil, Main Yard, effective the date of this letter, with additional clarification.

Section 6.0 Conclusions and Recommendations states, "As described in Section 1.1 of this report, the 2013 HSWA Permit Renewal identified 15 AOCs and SWMUs, as well as AOC 33, within the Main Yard of the Facility as requiring containment consisting of a cap to address arsenic-impacted surface soil. Arsenic-impacts associated with these 16 AOCs and SWMUs have either been previously approved for NFA, addressed by an overlapping CM, or recommended for NFA based on additional PDI data collected after the 2013 HSWA Permit Renewal. Subsurface soil deeper than 2 ft bgs with arsenic impacts at concentrations greater than 20 mg/kg will be addressed in a Facility-wide deed notice." An updated status and recommendation for these 16 AOCs/SWMUs was also included in Table 17 of this document. Please note, we concur with the previous NFA determinations for AOC 16a, 33, 34, 47, 49, 6a, and SWMU 16, 24 and 35 and concurs that NFA is necessary for AOC 23 and 44, and SWMU 19, 20, 27/39, and 41 in regard to arsenic impacted surface soil in the Main Yard.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,



Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

SEP - 4 2019

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: Response to USEPA/NJDEP Comments No Further Investigation Justification for Arsenic in Surface Soil at AOC 16B Area 1/35, dated August 13, 2019 (Original report dated April 11, 2019)  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Response to USEPA/NJDEP Comments (RTCs) No Further Investigation Justification (NFI) for Arsenic (As) in Surface Soil at AOC 16B Area 1/35 dated August 13, 2019, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The August 2019 RTCs NFI for As in Surface Soil at AOC 16B Area 1/35 was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C. 7:26E. EPA and NJDEP hereby approve the RTCs NFI for As in Surface Soil at AOC 16B Area 1/35 and the original NFI for As in Surface Soil at AOC 16B Area 1/35 dated April 11, 2019, effective the date of this letter. As discussed at our August 7<sup>th</sup> meeting, Chevron must include a narrative in each workplan that discusses all of the past, current, and future corrective measures required by the 2013 HSWA Permit.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

FEB 4 - 2020

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: Addendum to In-Situ Stabilization (ISS) and Ex-Situ Stabilization (ESS) Pre-Design Investigation (PDI) Summary and Justification for No Further Investigation (NFI) - AOC 46, dated May 21, 2019  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Addendum to ISS and ESS PDI Summary and Justification for NFI AOC 46 dated May 21, 2019, submitted pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C. 7:26E. We hereby approve the Addendum to ISS and ESS PDI Summary and Justification for NFI AOC 46, effective the date of this letter.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2

290 BROADWAY

NEW YORK, NY 10007-1866

September 9, 2020

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: 1. AOC 22 Construction Complete Report (CCR), dated July 2020  
2. NFA Justification for Arsenic Surface Soils at East Yard, dated June 1, 2020  
3. Justification for NFA for Lead and BaP in Soil: Main Yard, dated January 21, 2020  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the AOC 22 Construction Complete Report (CCR), dated July 2020, NFA Justification for Arsenic Surface Soils at East Yard, dated June 1, 2020, and Justification for NFA for Lead and BaP in Soil: Main Yard, dated January 21, 2020, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The workplans were submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E. Please note that a deed notice for BaP concentrations between 0.66 mg/kg and 10 mg/kg is required for AOC 22 under the 2013 HSWA Permit. Please confirm that this AOC will be included in a site-wide deed notice and that delineation of BaP impacted soils was completed. We hereby approve the above reports, effective the date of this letter, upon clarification of the BaP deed notice and impacted soils, if any, at AOC 22.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

October 14, 2020

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: Justification for No Further Investigation for Lead and BaP in Soil: AOC 16B Area 2, dated April 9, 2020  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Justification for No Further Investigation for Lead and BaP in Soil: AOC 16B Area 2, dated April 9, 2020, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The workplan was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E.

We have no further comments regarding the above document. Thus, we hereby approve Chevron's request for No Further Investigation for lead and BaP in soil at AOC 16B Area 2, effective the date of this correspondence. Please note that any future removal or alteration to the existing utilities will warrant remediation of the lead and BaP contaminated soil.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

December 11, 2020

Brian Conners  
Operations Lead, East  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: Response to USEPA Comment Letter, dated October 14, 2020  
Justification for NFA for Arsenic in AOC 16B – Tank 773 Area Groundwater  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Conners:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Response to USEPA Comment (RTC) Letter, dated October 14, 2020, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The workplan was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E.

We acknowledge Chevron's claim that groundwater Arsenic concentrations have been consistently below the CMI action level of 60 ug/L, warranting no further investigation. We also acknowledge Chevron's plan to address arsenic concentrations above the NJDEP Groundwater Quality Standard of 3 ug/L through the establishment of a Site-Wide Classification Exception Area. As a result, we hereby approve the RTC letter and Justification for NFA for Arsenic at AOC 16B – Tank 773 document, effective the date of this letter.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

March 3, 2021

Brian Conners  
Operations Lead, East  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: 1. NFA Justification for Arsenic in Surface Soil at SWMU 10, dated March 3, 2020  
2. Justification for NFA at SWMU 22, dated August 18, 2016  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Conners:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the NFA Justification for Arsenic in Surface Soil at SWMU 10, dated March 3, 2020 and Justification for NFA at SWMU 22, dated August 18, 2016, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. These workplans were submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E. We hereby approve the above documents, effective the date of this letter.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas". The signature is written in a cursive, flowing style.

Ricardito Vargas  
Project Manager WM  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

May 10, 2021

Brian Conners  
Operations Lead, East  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: 1. Proposal for No Further Investigation (NFI) for Benzene in Soil and Groundwater for SWMU 34, dated August 25, 2020  
2. Revised Figure and Data Tables Regarding Email Correspondence, dated April 30, 2021  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Conners:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Proposal for NFI for Benzene in Soil and Groundwater for SWMU 34, dated August 25, 2020. In addition, at the request of NJDEP, Chevron submitted a revised figure and data tables via email on April 30, 2021. These documents were submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The documents were submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E.

We accept the NFI proposal for benzene in soil and groundwater in SWMU 34, effective the date of this correspondence.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

May 10, 2021

Brian Conners  
Operations Lead, East  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: Justification for No Further Investigation for Arsenic in SWMU 11b Groundwater, dated August 18, 2020  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Conners:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Justification for No Further Investigation for Arsenic in SWMU 11b Groundwater, dated August 18, 2020, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. This document was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E.

We hereby approve the No Further Investigation Justification, effective the date of this correspondence.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas".

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

May 14, 2021

Brian Conners  
Operations Lead, East  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: 1. Justification for No Further Investigation for Arsenic in AOC 31 Groundwater, dated June 24, 2020  
2. In-Situ Chemical Oxidation Permit-By-Rule Monitoring Report for AOC 31 South, dated October 2020  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Conners:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the Justification for No Further Investigation for Arsenic in AOC 31 Groundwater, dated June 24, 2020 and In-Situ Chemical Oxidation Permit-By-Rule Monitoring Report for AOC 31 South, dated October 2020. In addition, at the request of NJDEP, Chevron provided additional information regarding monitoring well MW-9, including confirmation that MW-9 will be included in the site-wide groundwater monitoring program and will be analyzed for any potential migration of arsenic impacts outside of AOC 31. These documents were submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, New Jersey. The documents were submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C.7:26E.

We hereby approve the above documents, effective the date of this correspondence.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,

A handwritten signature in black ink that reads "Ricardito Vargas". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 2  
290 BROADWAY  
NEW YORK, NY 10007-1866

JUL 13 2019

Robert Mancini  
Project Manager, Refining Business Unit  
Chevron Environmental Management Company  
1200 State Street  
Perth Amboy, New Jersey 08861

Re: No Further Action Report for Arsenic in Surface Soil, Main Yard, dated February 26, 2019  
Former Chevron Perth Amboy Facility  
Perth Amboy, Middlesex County, New Jersey  
EPA ID #: NJD081982902

Dear Mr. Mancini:

The U.S. Environmental Protection Agency (EPA) Region 2 and the New Jersey Department of Environmental Protection (NJDEP) have completed our review of the No Further Action Report (NFA) for Arsenic (As) in Surface Soil, Main Yard dated February 26, 2019, submitted for the Former Chevron Perth Amboy Facility, in Perth Amboy, Middlesex County, NJ. The February 2019 NFA for As in Surface Soil, Main Yard was submitted by Chevron Environmental Management Company pursuant to the Resource Conservation and Recovery Act (RCRA), Hazardous and Solid Waste Amendments (HSWA) Permit of 2013, and the NJDEP Technical Requirements for Site Remediation, N.J.A.C. 7:26E. We hereby approve the February 2019 NFA for As in Surface Soil, Main Yard, effective the date of this letter, with additional clarification.

Section 6.0 Conclusions and Recommendations states, "As described in Section 1.1 of this report, the 2013 HSWA Permit Renewal identified 15 AOCs and SWMUs, as well as AOC 33, within the Main Yard of the Facility as requiring containment consisting of a cap to address arsenic-impacted surface soil. Arsenic-impacts associated with these 16 AOCs and SWMUs have either been previously approved for NFA, addressed by an overlapping CM, or recommended for NFA based on additional PDI data collected after the 2013 HSWA Permit Renewal. Subsurface soil deeper than 2 ft bgs with arsenic impacts at concentrations greater than 20 mg/kg will be addressed in a Facility-wide deed notice." An updated status and recommendation for these 16 AOCs/SWMUs was also included in Table 17 of this document. Please note, we concur with the previous NFA determinations for AOC 16a, 33, 34, 47, 49, 6a, and SWMU 16, 24 and 35 and concurs that NFA is necessary for AOC 23 and 44, and SWMU 19, 20, 27/39, and 41 in regard to arsenic impacted surface soil in the Main Yard.

Should you have any questions or would like to discuss this matter further, I can be reached at 212-637-3703, or via email at [vargas.ricardito@epa.gov](mailto:vargas.ricardito@epa.gov).

Sincerely,



Ricardito Vargas  
Project Manager  
Land and Redevelopment Programs Branch

cc: Charles Zielinski, NJDEP (electronic copy only)